

2,4,7,9-Tetramethyl-5-decyne-4,7-diol - Comments of Environmental Defense

(Submitted via Internet 6/17/02)

Environmental Defense appreciates this opportunity to submit comments on the robust summary/test plan for 2,4,7,9-Tetramethyl-5-decyne-4,7-diol (CAS#126-86-3).

2,4,7,9-Tetramethyl-5-decyne-4,7-diol appears to be minimally toxic and to be used primarily in industrial processes that result in little consumer exposure. Thus, this chemical has not been the subject of a great deal of toxicological or ecological research. Many of the studies that are available are very recent. Though data are limited, they adequately address all required SIDS elements and these studies have been clearly and concisely summarized in the Robust Summary/Test Plan submitted by Air Products and Chemicals, Inc. Therefore, our comments are limited to the following:

1. 2,4,7,9-Tetramethyl-5-decyne-4,7-diol is degraded very slowly in the environment. Therefore, even though such studies are not required under the terms of the HPV initiative, it would be desirable to have data describing chronic toxicity to fish and invertebrates.
2. Also, since 2,4,7,9-Tetramethyl-5-decyne-4,7-diol has the potential to persist in the environment, it would be desirable if the Test Plan could address precautions to be taken by the general public in case of a spill or accidental release of this chemical into the environment.
3. In the chromosomal aberration assay, page 5 of the Test Plan, doses are given as 19.5, 78.3, 312.5, 1250 and 3500 mg/ml. There appears to be an error in the units as all doses are high and the latter doses are impossible. It is assumed that these doses should have been given as mg/l rather than mg/ml. This error is not resolved by examination of the Robust Summary as the numbers but not the units were given in the description of this study.

Thank you for this opportunity to comment.

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